



301 North Elm Street, Suite 308  
Greensboro, North Carolina 27401

April 11, 2007

**CONFIDENTIAL AND NOT FOR PUBLIC DISPLAY**

*By Postal Mail to:*

Marlene H. Dortch  
Office of the Secretary  
FCC Room 3-C366  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

*And, by email to:*

Kathryn S. Berthot, Chief, Spectrum Enforcement Division, FCC  
Email address: [Kathy.Berthot@fcc.gov](mailto:Kathy.Berthot@fcc.gov)

*And, by email to:*

Carol Simpson, Policy Division, Public Safety and Homeland Security Bureau  
Email address: [Carol.Simpson@fcc.gov](mailto:Carol.Simpson@fcc.gov)

**Re: FCC letter of March 12, 2007 requesting current status of 911 compliance**

We are supplying your office with the information requested in your letter of March 2007 regarding our current status of 911 coverage to our VoIP subscribers.

We provide to our customers complete and compliant 911 coverage which we obtain through Dash911. Dash911 is provider of national emergency 911 service which is based in Denver, CO and they are well-known to your office.

Dash911 reports that they use a national backbone for 911 connectivity provided to them through Intrado as well as in some cases, Level 3. As you already know, Intrado and Level 3 operate the two most all-encompassing and pervasive connections to the Selective Routers and PSAPs in the United States. As a side note, Dash911 also provides to us emergency 911 services for any of our subscribers provisioned with a Canadian address.

Dash911 has provided information to us regarding the coverage, and type of coverage applicable and available to our subscriber base. They have also provided to us, and we have incorporated herein, information on 911 routing and connectivity, as well as additional information attached hereto as exhibits.

**Provision of Compliant 911 Service:** We provide 911 emergency calling services to 100% of our subscribers. Each and every one of our subscribers who dials 9-1-1 is able to reach a 9-1-1 emergency operator; in some cases depending on the type of emergency service provided in

certain areas, the caller reaches an emergency dispatch operator who has the responsibility for, and is capable of, immediately dispatching appropriate emergency responders to the caller's address.

According to a detailed analysis and report given to us by Dash911 approximately 94.7% our subscribers have complete and compliant coverage via the applicable Selective Router, that is to say "Enhanced 911" coverage. Nevertheless, all of our other subscribers DO have 911 emergency calling service although calls may in some cases and in some areas be delivered by a service method that is by other than Selective Router-transmitted calls.

Dash911 has reported to us that their backbone providers, such as and including Intrado, are diligently working to obtain agreements in other and additional geographic areas of the United States and Puerto Rico so as to be able to provide "Enhanced 911" coverage to approximately 93% of the population of the USA.

Intrado has repeatedly noted that getting agreements in place with those who control the Selective Routers and in some cases PSAPs directly, is a very complicated, arduous and extremely expensive process. In some cases the difficulty is due to state and local resistance and delay. Notwithstanding all the hurdles, ongoing and rapid progress is being made.

**911 Coverage:** We currently provide 911 emergency calling services to all of our subscribers in the USA. Any subscriber dialing 9-1-1 will be connected to an emergency operator or emergency services dispatcher. This is achieved by a combination of methods to deliver the 911 call, depending on the geographic area of the country and the type of 911 coverage that is otherwise available in that area.

The system as provided by Dash911 has a "fail proof" failover feature in that if for any reason the 9-1-1 call cannot be routed, the call is sent to the 24 x 7 Emergency Response Call Center where a trained professional answers the call and stays on the line while the call is forwarded to the correct PSAP.

There may be instances where we could have a subscriber to our VoIP service who lives in an area that is not now covered by a traditional wire line 911 PSAP, and in that case, the 911 call would be routed to the normal and usual 911 emergency response operator serving that subscriber's address.

**911 Routing Information/Connectivity to the Wireline E911 Network:** All 9-1-1 calls placed by our subscribers are transmitted to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority. These calls are transmitted using the Selective Router, trunk lines between the Selective Router and PSAP and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized and where Intrado and/or Level 3 have access and routing capability to those Selective Routers. To the extent that any percentage of our subscribers' 911 calls would currently be handled differently, those calls will be transmitted using the Selective Routers and Wireline E911 Network as soon as the backbone providers (Intrado and/or Level 3) gain access to those Selective Routers.

**New VoIP Customers and/or Marketing of VoIP Service:** We offer 9-1-1 emergency services calling capability to each of our customers, and we do not knowingly or intentionally market our services in areas where there is no ability to call 9-1-1. We do not allow subscribers on our system who, as subscribers to our system, would not be able to dial 9-1-1 and reach an

emergency service response operator or emergency services dispatcher. Our company is interested in making sure that we comply with FCC regulations, *but as importantly, that each of our customers can dial 9-1-1 and reach emergency response personnel at any time.*

We estimate that approximately 180 or 90% of our subscribers are new subscribers since November 28<sup>th</sup>, 2005.

**Additional information:** As a VSP using Dash911's E911 for VoIP service, we are able to route VoIP emergency calls from our switch to Dash 911's Intrado network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the appropriate Public Safety Answering Point (PSAP) via the existing 9-1-1 infrastructure. The Services utilized provide a 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers to the appropriate PSAP, based on the subscriber's registered address. The v9-1-1 solution enables full support of nomadic usage of VoIP telephone service, provided the user updates their address information upon connecting their telephone to the Internet at a new location/address. Through a web interface, the Dash911 solution enables the near real-time provisioning (Geo-coding and MSAG Validation) of the newly-provisioned address and makes available (assuming no errors) that particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information. Although the "15 minutes" time frame is the fastest update time that Intrado will indicate possible, Dash911 is currently working on a 911 solution that provides almost real-time address updating.

We trust this is the information you require, and we additionally refer you to other and relevant information submitted to your office by Dash911 and Intrado.

Sincerely,

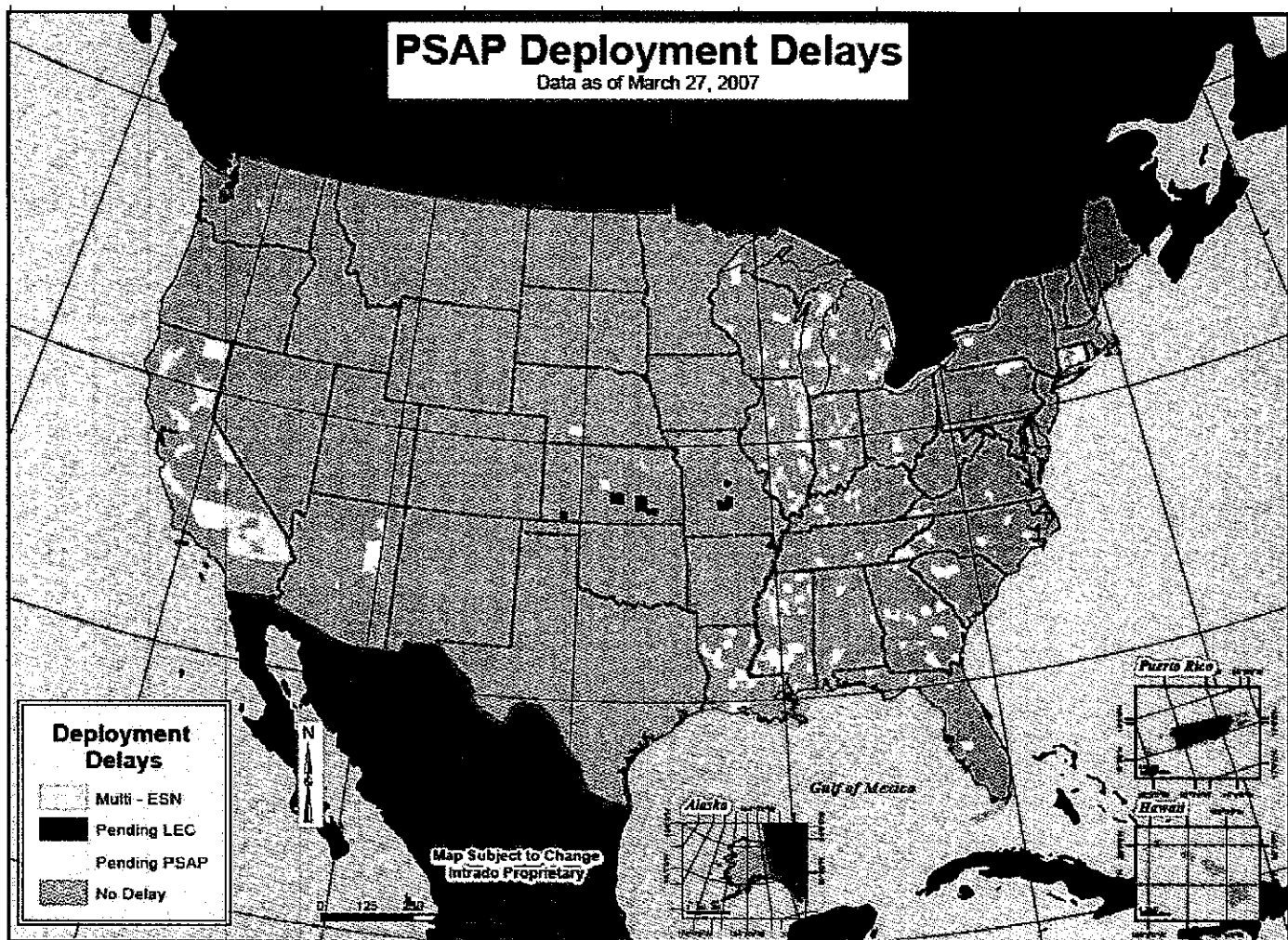
Donald Annas, Jr.



Triad Telecom, Inc.  
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**Exhibits - Intrado-supplied maps:**

- a. PSAP Deployment Delays
- b. Major Market Rollout Schedule



# Intrado Major Market Rollout Schedule

Data as of March 27, 2007

